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January 11, 2019

Hon. J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
Courtroom 706  
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Yesterday evening, the Government produced another tranche of discovery materials, which we picked up this morning.

Given our review of those materials, Mr. Parnas respectfully requests a second modification of the Protective Order governing discovery to allow him to produce the following additional items to the United States House of Representatives' Permanent Select Committee on Intelligence (HPSCI): (1) Image of Samsung phone, stamped USAO\_LP\_00000020; (2) Image of Apple iPhone Model A1549, stamped USAO\_LP\_00000032; (3) Image of Apple iPad Model A1397, stamped USAO\_00000033.

These materials fall within the scope of HPSCI's September 30, 2019 letter request and October 10, 2019 subpoena, in connection with the presidential impeachment inquiry. Review of these materials is essential to the Committee's ability to corroborate the strength of Mr. Parnas's potential testimony.

***The Government does not object to Mr. Parnas producing these materials to HPSCI, subject to receiving approval from the Court.***

At present, we do not know whether we intend to produce the entirety of the materials, or a subset filtered for either privilege or relevancy. If a subset, we will inform the Court and Government as to what we have actually have produced.

Thank you for consideration of this application.

Respectfully submitted,

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Joseph A. Bondy  
*Counsel to Lev Parnas*

c: All Counsel